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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all similarly  
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
 PLAINTIFFS' REQUEST FOR  
 REIMBURSEMENT OF ATTORNEYS'  
 FEES AND COSTS INCURRED FOR  
 SUCCESSFUL SANCTIONS MOTION**

The Honorable Susan van Keulen

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' request for reimbursement of attorneys' fees and costs incurred in bringing their motion for sanctions for discovery misconduct ("Plaintiffs' Request"). The Court has already found that Google committed discovery misconduct. The Court accordingly issued evidentiary sanctions against Google, and the Court also concluded that "Google must pay all attorneys' fees and costs incurred by Plaintiffs in filing the Sanctions Motion, including expert consultant and witness fees." Dkt. 588 at 7; *see also* Fed. R. Civ. P. 37(b)(2)(c) (requiring offending party to "pay the reasonable expenses, including attorney's fees, caused by the failure").

Therefore, the Court now **GRANTS** Plaintiffs' Request. Exhibit A to the Declaration of Mark Mao filed with Plaintiffs' Request shows that Plaintiffs incurred \$1,078,924.43 in attorneys' fees and costs in connection with their sanctions motion. Within one week of this Order, Google must pay that amount to Plaintiffs. Plaintiffs shall provide counsel for Google with wiring instructions.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Susan van Keulen  
United States Magistrate Judge